



Law Department  
Stephen W. Leermakers  
Senior Litigation Counsel  
(614) 790-4261

Ashland Chemical Company  
Division of  
Ashland Inc.

Address Reply:  
P.O. Box 2219  
Columbus, Ohio 43216  
Fax: (614) 790-4268

SDMS Document



84253

**VIA FEDERAL EXPRESS**

**December 28, 1995**

Mr. Lance Richman, P.G.  
Emergency and Remedial Response Division  
U.S. Environmental Protection Agency  
26 Federal Plaza, Room 13-100  
New York, NY 10278

DIRECTOR'S OFFICE

95 DEC 29 PM 12:51

**RE: Second Request for Information for the Diamond Alkali Superfund Site,  
Operable Unit 2**

Dear Mr. Richman:

The following is in response to the Second Request for Information directed to Ashland Chemical Company, a division of Ashland Inc. ("Ashland"). Ashland has made every effort to provide accurate and truthful responses to your questions, and we are aware that any subsequent information responsive to this request which may become available after submission of this document must be provided by way of supplementation.

**REQUEST FOR INFORMATION**

**400 Doremus Avenue Facility**

I. a. On page 15 of the Ashland Chemicals Product Catalog, provided in response to EPA's 104(e) Request for Information, lead compounds are mentioned as a product. Was this manufactured at the 400 Doremus Avenue Facility?

**Response:** The products listed on Page 15 of the Ashland Chemicals Product Catalog (dated 1975/76) are products which were sold by Ashland's Industrial Chemicals & Solvents Division rather than the Resins & Plastics Division which had a facility at 400 Doremus Avenue.

b. On page 15 of the Ashland Chemicals Product Catalog, provided in response to EPA's 104(e) Request for Information, nickel compounds are mentioned as a product. Was this manufactured at the 400 Doremus Avenue Facility?

**Response:** See Response to 1a. above.



Ashland Chemical's  
Commitment to  
Quality and Productivity

**Headquarters:**  
5200 Blazer Parkway  
Dublin, Ohio 43017  
(614) 790-3333

Cable Address: Aroplaz OH  
Telex: 245385  
Answerback: ASHCHEM  
Fax: (614) 790-4119



A Responsible Care  
Company

**842530001**

c. On page 15 of the Ashland Chemicals Product Catalog, provided in response to EPA's 104(e) Request for Information, arsenic compounds are mentioned as a product. Was this manufactured at the 400 Doremus Avenue Facility?

**Response:** See Response to 1a. above.

d. On page 15 of the Ashland Chemicals Product Catalog, provided in response to EPA's 104(e) Request for Information, methyl-ethyl-ketone (MEK) is mentioned as a product. Was this manufactured at the 400 Doremus Avenue Facility?

**Response:** See Response to 1a. above.

e. On page 12 of the Ashland Chemicals Product Catalog, provided in response to EPA's 104(e) Request for Information, ethyl benzene is mentioned as a product. Was this manufactured at the 400 Doremus Avenue Facility?

**Response:** The products listed on Page 12 of the Ashland Chemicals Product Catalog (dated 1975/76) are products which were sold by Ashland's Industrial Chemicals & Solvents Division rather than the Resins & Plastics Division which had a facility at 400 Doremus Avenue.

f. On page 12 of the Ashland Chemicals Product Catalog, provided in response to EPA's 104(e) Request for Information, benzene is mentioned as a product. Was this manufactured at the 400 Doremus Avenue Facility?

**Response:** See Response to 1e. above.

g. On page 12 of the Ashland Chemicals Product Catalog, provided in response to EPA's 104(e) Request for Information, methylene chloride is mentioned as a product. Was this manufactured at the 400 Doremus Avenue Facility?

**Response:** See Response to 1e. above.

2. a. For the manufacture of products that occurred at the 400 Doremus Avenue facility, please provide specific information as to the process of manufacture for those substances identified in your February 20, 1995 response to Question #3 in EPA's initial Request for Information, as well as those additional substances identified in response to Question #1 in this Supplementary Request for Information.

**Response:** The substances identified in our February 20, 1995, response to Question #3 were not manufactured at the 400 Doremus Avenue Facility, but rather were substances which may have been utilized in the manufacture of products at the 400 Doremus Avenue Facility. The substances identified in Question #1 were not manufactured at the 400 Doremus Avenue Facility.

b. Please list the chemical components of the by-products or other waste materials that were generated in the manufacture of these products, with the estimated quantities of these materials.

**Response:** As indicated in response to Question 2a., these substances were not manufactured at the 400 Doremus Avenue Facility.

842530002

- c. Please describe the method of disposal for each of these materials identified in 4.b. above.

**Response:** N/A

3. In regard to the 400 Doremus Avenue facility, during what years did the facility use the services of:

- a. Scientific Chemical Processing, Inc.

**Response:** The documentation provided for the first Request for Information are dated during parts of 1977 and 1978. No further information is available to Ashland at this time.

- b. Gaess Environmental Services

**Response:** Enclosed are documents regarding Gaess Environmental dated during the year 1976. No further information is available to Ashland at this time.

- c. D.V. Chemical Carting & Processing

**Response:** The documentation provided for the first Request for Information are dated during parts of 1978. No further information is available to Ashland at this time.

#### **221 Foundry Street Facility**

4. a. For the "physical blending or mixing of products" that occurred at the 221 Foundry Street facility, please provide specific information as to what materials were blended or mixed at the facility.

**Response:** Enclosed is a report of the list of products which were sold out of the 221 Foundry Street Facility during Ashland's fiscal year 1989 (October 1, 1988 to September 30, 1989); the only year for which data is currently available. Those substances which are believed to have been blends are marked immediately preceding the product (with a line mark.) At this point in time, the composition of these blends cannot be determined without considerable difficulty and expense. In all likelihood, these blends would be comprised of a combination of two or more of the substances otherwise sold at the 221 Foundry Street facility in New Jersey. These substances are also listed on the report enclosed.

- b. Please list the chemical components of the by-products, line flush, off-spec products, or other waste materials that were generated in this blending or mixing at the facility, with estimated quantities of these materials.

**Response:** To the best of our current knowledge, all of such materials were placed in a dedicated storage tank, and thereafter sold. No information regarding quantities, etc. is currently available.

- c. Please describe the method of disposal for each of these materials identified in b. above.

**Response:** See response to subpart b. above.

5. In regard to the 221 Foundry Street facility, during what years did the facility use the services of:

a. Marisol, Inc.

**Response:** 1983, 1987, 1988 and 1989.

b. Chemical Waste Management Services of New Jersey

**Response:** In the New Jersey Environmental Protection Hazardous Waste Generator Annual Report, 1987, Chemical Waste Management was named as a transporter. It is believed that all transactions involved; Ashland customer waste except possibly for 1 transaction in October, 1987.

6. Please provide all information regarding pollution discharges from the 221 Foundry Street facility discovered during May, 1976 by Passaic Valley Sewerage Commissioners inspectors and include all actions taken to remedy and/or eliminate the discharges.

**Response:** Ashland has no records, other than the ones provided by the U.S. Environmental Protection Agency pursuant to a FOIA request concerning any 1976 discharges at the 221 Foundry Street facility.

7. The attachments submitted in your February 20, 1995 response contained a Contingency Plan and Emergency Procedures for the facility located at 221 Foundry Street. This Plan described the use of a neutralization pit in which waste acids or bases from inorganic drumming operations were collected, neutralized and pumped into the sanitary sewer.

Please answer the following:

a. Identify the waste acids or bases that were collected/generated from this drumming operation.

**Response:** Based upon current recollection, the acids and bases pumped into the neutralization pit may have included sulfuric acid, nitric acid, phosphoric acid and sodium hydroxide.

b. Provide an estimate of the amounts of waste acid or bases that were neutralized in the neutralization pit per week.

**Response:** Attached are recently located copies of monitoring discharge reports which appear to indicate discharges during 1982, 1983 and 1984.

c. Were the inorganic compounds in this waste separated out or pretreated before being pumped into the sanitary sewer?

842530004

**Response:** Based upon current recollection, and as indicated in the attached documents, Ashland pretreated any substances in the neutralization pit to the pH dictated by the Passaic Valley Sewage Commission; inorganic compounds would not have been in the neutralization pit.

**Both Facilities**

8. Please provide a detailed description of any civil, criminal or administrative proceedings issued against your company for violations of any local, State or federal laws or regulations relating to water pollution or hazardous waste generation, storage, transport or disposal relating to the 221 Foundry Street or 400 Doremus Avenue facility.

**Response:** At this time, Ashland has no further information beyond that submitted in the Response to Number 11 of the First Request for Information.

9. Please identify, by name and last known address, the facility plant manager for the 221 Foundry Street facility and the 400 Doremus Avenue facility, as well as the person who was directly responsible for the processing, treatment and/or disposal of hazardous wastes, during the years of operation of each facility.

The following is a list of 221 Foundry Street Facility District Managers and Plant Manager.

Robert Severns          District Manager  
2444 Capital Landing  
Chesterfield, MO 63017

Dave Morrison          District Manager  
66 Graphic Blvd.  
Sparta, NJ 07871

Michael McCann          District Manager  
248-20 54 Avenue  
Douglaston, NY 11362

Ralph Davies          District Manager  
175 Wildwood Road  
Lake Forest, IL 60045

Thomas Goodwin          District Manager  
611 Kingsborough Ct.  
Perrysville, OH 43551

Ed Kelly          District Manager  
6247 Memorial Drive  
Dublin, OH 43017

Willie Elsasser          Plant Manager (Deceased)

842530005

The following is a list of Plant Managers for the 400 Doremus Avenue Resins & Plastics plant. Since Ashland sold the 400 Doremus Avenue facility in 1978, it has few records regarding the facility or access to persons who may have been associated with the facility. Therefore Ashland submits the following information as a good faith effort to answer this request.

Lee Paul        1971-73        Plant Manager  
Unknown Address

Jim Brooks     1976            Plant Manager  
Unknown Address

Jim Goerke     1973            Plant Manager  
14165 Crosstrails  
Chesterfield, MO 63017

10. Please identify by name and last known address any former employees of the 221 Foundry Street or the 400 Doremus Avenue facility, who were contacted in formulating a response to these questions. Please indicate the facility at which each person worked.

Ed Papson, Chemist  
c/o Ashland Chemical Company  
P.O. Box 2219  
Columbus, OH 43216  
Worked at the 221 Foundry Street Facility

Richard Gose, Regional Manager  
c/o Ashland Chemical Company  
P.O. Box 2219  
Columbus, OH 43216  
Worked at the 221 Foundry Street Facility

Since Ashland sold the 400 Doremus Avenue Facility in 1978, it has few records regarding the facility or access to persons who may have been associated with the facility. Ashland has attempted to respond to the Requests for Information by conducting an investigation but has been unable to directly talk with any former employees of the 400 Doremus Avenue facility; however, information has been obtained from individuals who have been members of staff groups supporting the facility.

In replying to this Request, Ashland Chemical Company has not and shall not be deemed to have admitted any liability or responsibility with respect to the Site, the subject matter of the Request or any other matter. If, following your review EPA has any questions concerning any response herein, please contact me.

842530006

Lance Richman  
December 28, 1995  
Page 7

Based upon the additional investigation which has been undertaken subsequent to the filing of the response to the First Request for Information, Ashland will be filing, in the near future, a supplemental response to the original Request.

Very truly yours,



Stephen W. Leermakers

/nj

Enclosures

842530007